



University of Hawaii at Manoa

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April 14, 1987

RP:0072

Mr. Kamaki A. Kanahale, III
Administrator
Office of Hawaiian Affairs
1600 Kapiolani Boulevard
Suite 1500
Honolulu, Hawaii 96814

Attention: Leslie Pyun, Land Division

Dear Mr. Kanahale:

Public Notices

Kahe (HIT 000610923)/Waiau (HIT 000610873)
Hawaiian Electric Company (HECO)
Proposed Closure Plans for Surface Hazardous Waste Holding Ponds
Kahe, Waianae; Waiau, Pearl City, Oahu

In response to your request we have conducted a review of the above noted documents. It is our understanding that our comments will be incorporated in your own in-house review of the proposed project. Please note that our review has been prepared with the assistance of Keith Chave, Oceanography; Hans-Jurgen Krock, Ocean Engineering; Roy Takekawa, Environmental Health and Safety Office; and Pamela Bahnsen, Environmental Center.

The cited documents discuss the closure of hazardous waste holding ponds at two HECO plants, Waiau and Kahe. The four ponds proposed for closure at Waiau consist of approximately one acre (48,380 sq. ft.) and have a maximum volume of 1,810,000 gallons. Kahe's four ponds proposed for closure encompass approximately one and three-quarter acres (75,260 sq. ft.) and have a maximum volume of 2,660,000 gallons.

Generally, our reviewers found the documents to be quite adequate in their address of the technical considerations involved in the closure of the ponds and were complimentary of the proposed closure of these ponds and of the thoroughness with which the documents themselves were prepared. We do, however, offer the following comments for your consideration.

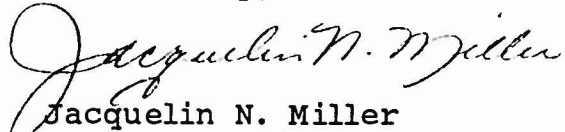
We note that presently there are no plans for the ponds to be monitored after closure. We are concerned that, with time, precipitates of the heavy metals may be susceptible to resolubilization under lowered pH conditions

resulting from rain and groundwater infiltration in some of the ponds. Therefore, we suggest that soil sampling at the respective sites be continued past the closure date.

Utilization of the proposed eight holding pond areas, after closure, is of some concern. We note that Kahe's ponds, upon closure, will be placed back into service as part of HECO's new wastewater management system. However, the four ponds at Waiau will be "graded back to the natural conditions of the area" (p. 51). After grading, the potential for hazardous contaminants should be considered and evaluated prior to commitments for subsequent uses.

We hope that our comments will be useful in the preparation of your review and would appreciate receiving a copy.

Yours truly,

A handwritten signature in cursive script, reading "Jacquelin N. Miller".

Jacquelin N. Miller
Acting Associate
Environmental Coordinator

cc: Stephen Lau
Keith Chave
Hans-Jürgen Krock
Roy Takekawa
Pamela Bahnsen